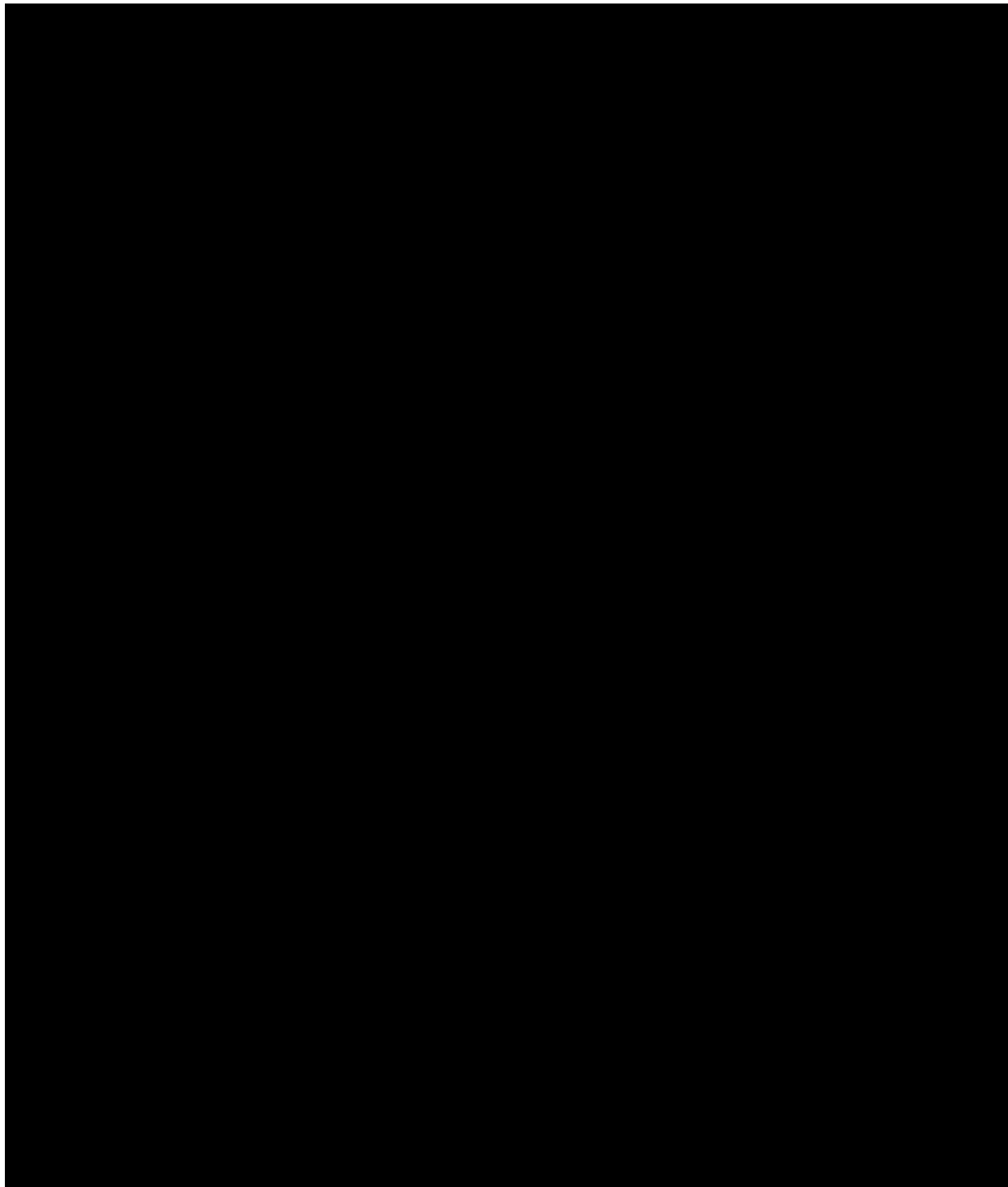


The People of the State of Illinois'
Responses to Ameren Illinois Company's First Set of Data Requests
ICC Docket No. 15-0142
Sponsor: AG witness Sebastian Coppola
June 19, 2015

AIC-AG 1.05 (Non-union Wages) Please provide a copy of the "IHS Economics, April 2015 report" referenced at page 7, footnote 4 of Mr. Coppola's Direct Testimony.

Response: Please see Attachment AIC-AG 1.05.

ILLINOIS COMMERCE COMMISSION Docket 15-0142
CONFIDENTIAL – Copyright information
Attachment AIC-AG 1.05.



The People of the State of Illinois'
Responses to Ameren Illinois Company's First Set of Data Requests
ICC Docket No. 15-0142
Sponsor: AG witness Sebastian Coppola
June 19, 2015

AIC-AG 1.06 (Non-union Wages) Please identify with specificity where in the "IHS Economics, April 2015 report" referenced at page 7, footnote 4 of Mr. Coppola's Direct Testimony the following numbers cited in Mr. Coppola's Direct Testimony can be found:

2012: 2%
2013: 1.9%
2013: 2.1%

Response: Please see Attachment AIC-AG 1.05, about the middle of the page.

The People of the State of Illinois'
Responses to Ameren Illinois Company's First Set of Data Requests
ICC Docket No. 15-0142
Sponsor: AG witness Sebastian Coppola
June 19, 2015

AIC-AG 1.13 (Non-union Wages) Prior to preparing his Direct Testimony, did Mr. Coppola prepare any study or analysis that compares AIC's historical and/or projected non-union wage increases to the historical and/or projected non-union wage increases of any other utility? If the response is anything other than an unqualified no, please provide a copy of any such study or analysis.

Response: No. In Mr. Coppola's view, such a study or analysis was not necessary for purposes of analyzing AIC's forecasted level of employee wage increases.

The People of the State of Illinois'
Responses to Ameren Illinois Company's First Set of Data Requests
ICC Docket No. 15-0142
Sponsor: AG witness Sebastian Coppola
June 19, 2015

AIC-AG 1.14 (Non-union Wages) Prior to preparing his Direct Testimony, did Mr. Coppola prepare any study or analysis that compares AMS's historical and/or projected non-union wage increases to the historical and/or projected non-union wage increases of any other company? If the response ¹is anything other than an unqualified no, please provide a copy of any such study or analysis.

Response: Please see response to data request AIC-AG 1.13.

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The People of the State of Illinois'
Responses to Ameren Illinois Company's First Set of Data Requests
ICC Docket No. 15-0142
Sponsor: AG witness Sebastian Coppola
June 19, 2015

AIC-AG 1.41 (Incentive Compensation) Is it Mr. Coppola's position that utility employee safety is not important to AIC's gas customers? If the response is anything other than an unqualified no, please explain the basis for the response and provide all documents reviewed or relied on to support the response.

Response: In his testimony, Mr. Coppola made clear that many of the operating measures used by the Company are worthy goals or metrics to monitor. However, not all of them rise to the level of being directly tangible or of value to customers of the Company, who are mainly concerned with having affordable gas bills and reliable service.

The People of the State of Illinois'
Responses to Ameren Illinois Company's First Set of Data Requests
ICC Docket No. 15-0142
Received: June 12, 2015
Responded: June 25, 2015
Sponsor: AG witness Sebastian Coppola

AIC-AG 1.91 (Pension/OPEB) Referring to lines 425-26 of his Direct Testimony, does Mr. Coppola agree that non-qualified retirement plans are “typically offered to executive management by many corporations”? Explain the basis for your response, and provide all documents you relied upon in developing your response.

Response: Yes. As explained on page 22 and 23 of Mr. Coppola's direct testimony, although utility executives receive these benefits, it does not mean they should be recovered in rates billed to customers.

The People of the State of Illinois'
Responses to Ameren Illinois Company's Fourth Set of Data Requests
ICC Docket No. 15-0142
Sponsor: AG witness Sebastian Coppola
Received August 7, 2015
Responded: August 14, 2015

AIC-AG 4.01 Referring to Attachment AIC-AG 1.05 (Confidential), does Mr. Coppola agree that the "Employment Cost Index" shown for 2015 is 2.5%? If the response is anything other than an unqualified "yes," please explain the basis for the response and provide all documents reviewed or relied on to support the response.

Response: Yes. However, it is critical to understand that the Index includes all components of labor cost increases, including base wages, merit increases, bonuses or short-term incentive payments, and increases in benefit costs.

The People of the State of Illinois'
Responses to Ameren Illinois Company's Fourth Set of Data Requests
ICC Docket No. 15-0142
Sponsor: AG witness Sebastian Coppola
Received August 7, 2015
Responded: August 14, 2015

AIC-AG 4.02 Referring to Attachment AIC-AG 1.05 (Confidential), does Mr. Coppola agree that the "Employment Cost Index" shown for 2016 is 2.7%? If the response is anything other than an unqualified "yes," please explain the basis for the response and provide all documents reviewed or relied on to support the response.

Response: Yes. However, it is critical to understand that the Index includes all components of labor cost increases, including base wages, merit increases, bonuses or short-term incentive payments, and increases in benefit costs.

The People of the State of Illinois'
Responses to Ameren Illinois Company's Fourth Set of Data Requests
ICC Docket No. 15-0142
Sponsor: AG witness Sebastian Coppola
Received August 7, 2015
Responded: August 14, 2015

AIC-AG 4.03 Referring to Attachment AIC-AG 1.05 (Confidential), does Mr. Coppola agree that the "Employment Cost Index" shown for 2017 is 3.0%? If the response is anything other than an unqualified "yes," please explain the basis for the response and provide all documents reviewed or relied on to support the response.

Response:

OBJECTION: The AG objects to this question because it relates to information after the 2016 test year, and therefore is irrelevant and inadmissible. Without waiving this objection, the AG responds as follows:

Yes. However, it is critical to understand that the Index includes all components of labor cost increases, including base wages, merit increases, bonuses or short-term incentive payments, and increases in benefit costs.

The People of the State of Illinois'
Responses to Ameren Illinois Company's Fourth Set of Data Requests
ICC Docket No. 15-0142
Sponsor: AG witness Sebastian Coppola
Received August 7, 2015
Responded: August 14, 2015

AIC-AG 4.04 Referring to Attachment AIC-AG 1.05 (Confidential), does Mr. Coppola agree that the "Employment Cost Index" shown for 2018 is 3.1%? If the response is anything other than an unqualified "yes," please explain the basis for the response and provide all documents reviewed or relied on to support the response.

Response:

OBJECTION: The AG objects to this question because it relates to information after the 2016 test year, and therefore is irrelevant and inadmissible. Without waiving this objection, the AG responds as follows:

Yes. However, it is critical to understand that the Index includes all components of labor cost increases, including base wages, merit increases, bonuses or short-term incentive payments, and increases in benefit costs.

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Responses to Ameren Illinois Company's Fourth Set of Data Requests
ICC Docket No. 15-0142
Sponsor: AG witness Sebastian Coppola
Received August 7, 2015
Responded: August 14, 2015

AIC-AG 4.05 Referring to lines 192-193 of Mr. Coppola's rebuttal testimony, please provide a complete copy of the "U.S. Census Bureau American Community Survey document" referenced, and please provide the page number(s) of the document from which the information in AG Exhibit 5.4 was taken. If the information in AG Exhibit 5.4 was taken from an online source, please provide the web address of that source and the date(s) it was accessed to prepare Attachment AIC-AG 1.04.

Response: The source of the Illinois Median Household Income is a web service and can be accessed by using the following link: <http://www.deptofnumbers.com/income/illinois/>

The information in AG Exhibit 5.4 was accessed on or about June 5, 2015. Mr. Coppola did not obtain a copy of the actual U.S. Census Bureau American Community Survey and instead utilized the aforementioned service that analyzed the survey data from the U.S. Census Bureau and reported the information shown in the exhibit.

The People of the State of Illinois'
Responses to Ameren Illinois Company's Fourth Set of Data Requests
ICC Docket No. 15-0142
Sponsor: AG witness Sebastian Coppola
Received August 7, 2015
Responded: August 14, 2015

AIC-AG 4.07 Referring to Attachment AIC-AG 1.05 (Confidential), please provide a complete copy of the April 2015 IHS Economics report. If a complete copy of the report cannot be provided, please explain why a complete copy of the report is not available, and explain why the page of the report that is Attachment AIC-AG 1.05 is available.

Response:

OBJECTION: The AG objects to this discovery response because it seeks information not in the possession of the AG's expert witness or the AG. The AG also objects to this request because it seeks information which is irrelevant and therefore inadmissible in this proceeding. Without waiving the objections, the AG responds as follows:

Mr. Coppola obtained the information included in Attachment AIC-AG 1.05 from a response to a discovery request in another utility rate case; Mr. Coppola does not have the full report. The full report was not provided to Mr. Coppola because it contained other data not pertinent to the use of cost increase indices. It is Mr. Coppola's understanding that the rest of the report contains proprietary and copyrighted information which is not pertinent or relevant to the specific use in calculating the rate of increase in compensation.

IHS is a well-known and respected global econometrics research firm which uses statistical labor cost data released by the U.S. Department of Labor to analyze and publish historical and forecasted U.S. labor cost information. As discussed in the Rebuttal Testimony of Ameren

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witness Marla Langenhorst (Ameren Exhibit 31.0 at 12:232-237), the source of the information included in the Employment Cost Index-Total Compensation is the Bureau of Labor Statistics, which publishes historical information on labor costs on a quarterly basis. The reasonableness of the Employment Cost Index-Total Compensation data included in Attachment AIC-AG 1.05 can be verified by accessing the Bureau of Labor Statistics Employment Cost Index web page at:

<http://www.bls.gov/news.release/eci.toc.htm>.

**The People of the State of Illinois’
Response to Ameren Data Request AIC-AG 7.07
ICC Docket No. 15-0142
August 22, 2015**

AIC-AG 7.07 Does Mr. Coppola agree his rebuttal adjustment shown on AG Exhibit 5.7 REV should be corrected to reflect the Company’s Rebuttal filing request of \$2.80 for gasoline and \$3.24 for diesel fuel, and that making such a correction would result in an adjustment of \$(240.295) rather than \$(491,722). If Mr. Coppola’s response is anything other than an unqualified yes, please fully explain, and provide all supporting documentation, including, but not necessarily limited to, a corrected calculation, with working formulas intact.

Response: While Mr. Coppola will not be updating his AG Ex. 5.7 REV for this change, he does acknowledge that if the Company’s Rebuttal case requests an assumed \$2.80 for gasoline and \$3.24 for diesel fuel, that making such a modification would result in an adjustment of \$(240.295) rather than \$(491,722).

ICC Docket No. 15-0142
Responses of the People of the State of Illinois
to Ameren Illinois Company's
Seventh Set of Data Requests
Requested: August 19, 2015
Responded: August 21, 2015
Sponsored by: Sebastian Coppola

AIC-AG 7.11 Does Mr. Coppola agree his rebuttal adjustment shown on AG Exhibit 5.7

REV would change from \$(491,722) to \$(138,626) if he reflected the Company's Surrebuttal price of \$2.62 for gasoline and \$3.03 for diesel fuel? If Mr. Coppola's response is anything other than an unqualified yes, please fully explain, and provide all supporting documentation, including, but not necessarily limited to, a corrected calculation, with working formulas intact.

Response: Mr. Coppola agrees that if the latest revised Company fuel prices of \$2.62 for gasoline and \$3.03 for diesel were reflected in AG Exhibit 5.7 REV, then the AG rebuttal adjustment for fuel expense would change to \$(138,626).